

## **REMARKS/ARGUMENTS**

### **I. Introduction:**

Applicants respectfully request reconsideration of the rejection of claims 1-32. Applicants also request consideration of claims 33-38, which were added in Amendment A, filed April 17, 2006, but were not addressed in the final Office Action.

### **II. Claim Rejections – 35 U.S.C. 102:**

Claims 1, 6, 11, 16, 21, 26, and 31 stand rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,856,974 (Gervais et al.).

Gervais et al. disclose an internetwork address mapping gateway. The address mapping gateway maintains an address mapping table that provides a cross-reference between (1) a source node address and network number of the local network in which the node resides, and (2) a gateway-mapped node address generated by the address mapping gateway. Upon receipt of a packet from the source node, the address mapping gateway performs an address translation to a globally-unique network layer address. Upon receipt of a packet destined for a destination node in the domain, the gateway performs a reverse translation to the originally assigned network layer address.

Gervais et al. do not disclose formatting an IP packet to include a globally significant IP address identifying a realm *and* a locally significant IP address identifying a destination of the packet within the realm. In contrast, Gervais et al. operate to perform a conventional mapping between interior private addresses and public globally significant addresses.

Applicants' invention, as set forth in the claims, is particularly advantageous in that it provides for interoperation between realms employing private local addresses and realms employing globally unique addresses while allowing nodes outside the private realm to initiate sessions with nodes inside the private realms without the need for

mapping IP addresses between unregistered locally significant addresses and globally significant registered addresses.

Accordingly, claims 1, 6, 11, 16, 21, 26, and 31 are submitted as not anticipated by Gervais et al.

Claims 33-38, depending either directly or indirectly from claim 1, are submitted as patentable for at least the reasons discussed above with respect to claim 1.

Claims 7-9, 17-19, 27-29, and 32 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,418,476 (Luciani).

Luciani discloses a method for synchronizing network address translator (NAT) tables using OSPF (Open Shortest Path First) opaque LSA (Link State Advertisement). Luciani uses conventional NAT to provide network address translator functionality at border routers (see, e.g., col. 2, line 61 - col. 3, line 18). Mappings are provided between interior private addresses and public globally significant addresses.

Claim 7 is directed to a method for operating a gateway node to handle a received packet and includes extracting a globally significant destination address from a destination address field of the packet. If the globally significant destination address identifies a realm directly attached to the gateway node, a locally significant destination address is extracted from the packet and placed in the destination address field and the packet is forwarded to a local destination within the realm.

There is no disclosure in Luciani of extracting a globally significant destination address from a destination address field of a packet received at a border router and placing the locally significant destination address in the destination address field. In contrast to the method set forth in claim 7, Luciani uses a NAT table at the border router to identify the local IP address that is mapped to a globally unique IP address.

In *Response to Arguments* section of the Final Office Action, the Examiner states that "reading IP address is equivalent to extracting a globally significant destination address from the field in order to translate into the local IP address assigned for the host." However, Luciani does not read a locally significant destination address from a packet.

Instead, Luciani reads the local IP address from a table in order to translate the globally unique destination IP address to the local IP address.

Accordingly, claims 7, 17, 27, and 32, and the claims depending therefrom, are submitted as not anticipated by Luciani.

### III. Claim Rejections – 35 U.S.C. 103:

Claims 2-4, 12-14, and 22-24 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Gervais in view of U.S. Patent No. 6,304,913 (Rune).

Rune is directed to an Internet system and method for selecting a closest server from a plurality of alternative servers. The system includes a conventional DNS server for storing a common host name and a plurality of unique IP addresses. The system also includes a requesting host for transmitting a translation request containing the common host name to the database. In response to the translation request, the system selects the unique IP address assigned to the server located the nearest to the requesting host.

Neither Gervais nor Rune show or suggest resolving a globally significant IP address from a first component of a globally significant name and resolving a locally significant IP address from a second component of a locally significant name.

Rune simply uses a conventional DNS server to replace a common host name with an IP address. There is no teaching of resolving both a globally significant IP address and a locally significant IP address. Furthermore, there is no discussion of resolving an IP address from one component of a name.

Accordingly, claims 2-4, 12-14, and 22-24 are submitted as patentable over Luciani and Rune.

Applicants respectfully submit that the other reference cited, including U.S. Patent Publication No. 2002/0169887 (McLampy et al.), do not remedy the deficiencies of the primary references. Claims 5, 15, and 25 are therefore submitted as patentable over the cited references, for the reasons discussed above.

IV. Conclusion:

For the foregoing reasons, Applicants believe that all of the pending claims are in condition for allowance and should be passed to issue. If the Examiner feels that a telephone conference would in any way expedite the prosecution of the application, please do not hesitate to call the undersigned at (408) 399-5608.

Respectfully submitted,



Cindy S. Kaplan  
Reg. No. 40,043

P.O. Box 2448  
Saratoga, CA 95070  
Tel: 408-399-5608  
Fax: 408-399-5609